

9

For Six Month Period Ending \_\_\_\_\_  
(Insert date)

Name of Registrant **TRIBUNE FILMS INC** Registration No. **1810**

Business Address of Registrant **303 FIFTH AVENUE, ROOM 1909, NEW YORK, NY 10016**

**I-REGISTRANT**

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

RESIDENCE ADDRESS OF ROMA SPREDD, PRESIDENT,  
CHANGED. NEW SHORT-FORM REGISTRATION STATEMENT  
IS ENCLOSED WHICH SUPERSEDES STATEMENT OF 11/16/73.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☐

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

BERMUDA DEPARTMENT OF TOURISM and THE IRISH TOURIST BOARD.

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Distribution of travelogs to promote tourism to the countries involved.

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
 Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government, foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
11/1/89-4/30/90	BERMUDA DEPARTMENT OF TOURISM	FILM DISTRIBUTION	\$ 344.45
11/1/89-4/30/90	IRISH TOURIST BOARD	FILM/VIDEO DISTRIBUTION	\$6,846.00

Total \$7,190.45

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).  
<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☐      No ☒

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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Total

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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## V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☐ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches

☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☐ English

☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☐    No ☐

Exhibit B<sup>7</sup>    Yes ☐    No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits?

Yes ☐

No ☐

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

*Roma Sfreddo*  
ROMA SFREDDO

Subscribed and sworn to before me at 303 FIFTH AVENUE, NEW YORK, NY 10016

this 13th day of SEPTEMBER, 19 90

JOSEPHINE KLEIMAN  
Notary Public, State of New York  
No. 4504334

Qualified in New York County  
Commission Expires March 30, 1991

November 30, 1991

*Josephine Kleiman*  
(Signature of notary or other officer)

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

Registrant: Tribune Films, Inc.  
Registration#: 1810

The following persons in your organization filed short form registration statements on the date indicated by each name. These short forms are still in an active status. Please review and update where appropriate.

Date Filed	Name	Current Role	Termination Date?
<del>11/20/64</del> 11/14/73	Roma Sfreddo	President	STILL ALIVE.

DON'T KNOW WHY YOU SAY 11/20/64. IX DID FILE ANOTHER ON  
11/16/73 AND I AM NOW FILING ONE FOR 9/13/90.

*COPY ENCLOSED*

INTERNAL SECURITY  
SECTION  
REGISTRATION DIV

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CRIMINAL DIVISION

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

## SHORT-FORM REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

COPY OF  
11/16/73  
FOR YOUR  
RECORDS

Each partner, officer, director, associate, employee and agent of a registrant is required to file a short-form registration statement unless he engages in no activities in furtherance of the interests of the registrant or his principal or unless the services he renders to the registrant are in a secretarial, clerical, or administrative or similar capacity.

1. Name <b>ROMA SFREDO</b>	Registration No. <b>1810</b>
2. Residence Address <b>240 East 35 Street New York, NY 10016</b>	3. Business Address <b>38 West 32 Street New York, N. Y. 10001</b>
4. Date and Place of Birth <b>10/13/26, Stafford Springs, Conn.</b> Present Citizenship <b>U.S.A.</b>	5. If present citizenship was not acquired by birth, indicate when, where, and how acquired. <b>---</b>

6. Occupation: **Executive**

7. What is the name and address of the individual or organization whose registration made it necessary for you to file this statement?

Name **TRIBUNE FILMS, INC.**Address **38 West 32 Street, New York, NY 10001**

8. List every foreign principal of the individual or organization named in Item 7. **Alpine Tourist Company, Bahama Islands Tourist Office, Barbados Tourist Board, Bermuda Department of Tourism, Cadok, Ceylon Tourist Board, Danish National Tourist Office, Finnish National Tourist Office, Irish Tourist Board, KLM Royal Dutch Airlines, Scandinavian National Tourist Offices and Swiss National Tourist Office.**

9. Indicate your connection with the individual or organization named in Item 7.

☐ partner☒ director☒ officer☐ associate☐ other (specify) \_\_\_\_\_

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SECTION  
REGISTRATION UNIT

10. Describe in detail all services which you have rendered or will render to the individual or organization named in Item 7. If you are no longer rendering such services, indicate period of past services. (If space is insufficient, a full insert page must be used.)

**I attempt to secure accounts, oversee the distribution of films for all of our accounts, do a great deal of paperwork in connection with the distribution of films (which is the business of Tribune Films, Inc.).**

11. Do any of the above described services include political activity as defined in the footnote below?

☐ Yes ☒ No

If yes, fully describe such political activity

12. The services described in Item 10 are to be rendered on a

☒ full time basis

☐ part time basis

☐ special basis

13. What compensation are you receiving or will receive for above services?

☐ Salary: Amount \$ 15,300 per annum

☐ Commission at \_\_\_\_\_ % of \_\_\_\_\_

☐ Fee: Amount \$ \_\_\_\_\_

☐ Other thing of value \_\_\_\_\_

14. What compensation or thing of value have you received to date for above services?

Date

From Whom Received

Amount

**I receive my salary from Tribune Films, Inc.—not more nor less—and nothing from anyone else.**

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with an election to political office or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

Date

Amount of  
thing of value

Name of  
political  
organization

Name of  
candidate

November 16, 1973

Date of Signature

Signature

Subscribed and sworn to before me at New York, N. Y.

this 16th day of November, 19 73

Signature of notary or other officer

My commission expires \_\_\_\_\_, 19\_\_\_\_

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ or No XX

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes XX or No \_\_\_\_\_

If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Roma Sfreddo  
Signature

FEBRUARY 8, 1991  
Date

ROMA SFREDDO  
Please type or print name of  
signatory on the line above

PRESIDENT  
Title

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